

**NATIONAL LABOR RELATIONS BOARD
REGION 28**

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TRAX INTERNATIONAL CORPORATION)	
)	
and)	Case No. 28-RC-157129
)	Case No. 28-RC-157323
MACHINISTS LOCAL, INTERNATIONAL)	
ASSOCIATION OF MACHINISTS AND)	
AEROSPACE WORKERS, AFL-CIO)	
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MOTION TO STAY FURTHER PROCESSING OF PETITIONS

Pursuant to Section 102.65 of the National Labor Relations Board's Rules and Regulations, TRAX International Corporation ("TRAX" or "the Company") respectfully requests that Region 28 ("the Region") stay further processing of the petitions filed in the above-captioned consolidated cases pending the results of the RM petition filed by TRAX in Case No. 28-RM-157889.¹

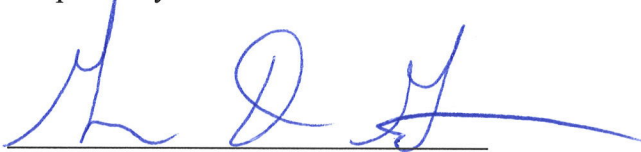
In its RM petition, TRAX seeks an election in a "contract-wide" unit of approximately 760 full-time hourly employees who provide services to the U.S. government at the Yuma Proving Ground ("YPG") under the Company's government contract, excluding employees in TRAX's Business, and Safety and Quality Departments. In the petition filed in Case No. 28-RC-157128, Machinists Local 2822, International Association of Machinists and Aerospace Workers, ("IAM" or "the Union") seeks a representation election in a group of seven employees who work in the Company's Telecommunications Section. In the petition filed in Case No. 28-RC-157323, the Union seeks an election of 15 employees who work in the Company's Ammunition Logistics Section. The Region conducted a pre-election hearing in the above-

¹ A copy of the RM petition in Case No. 28-RM-157889 is attached as Exhibit 1 hereto.

captioned cases on August 12, 2015, in which the Company adduced evidence showing that the petitioned-for units were inappropriate for bargaining. The Region has not yet issued a decision in either of the consolidated cases.

For the reasons articulated during the hearing in the above-captioned cases and in Case No. 28-RC-155938, TRAX believes that an election should be conducted on a contract-wide basis among all full-time hourly employees working at YPG. To avoid the potential for conflicting results, the Region should stay any further processing of the petitions in the above-captioned cases pending the results of the RM petition. A stay is warranted because absent a stay, TRAX employees' Section 7 rights to be represented in a unit appropriate for bargaining will be harmed irreparably.

Respectfully submitted

A handwritten signature in blue ink, appearing to read 'H. D. Gies', written over a horizontal line.

Thomas P. Gies
Glenn D. Grant
Crowell & Moring LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2595
(202) 624-2852

Counsel for TRAX International Corporation

August 17, 2015

EXHIBIT 1

UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

RM PETITION

DO NOT WRITE IN THIS SPACE

Case No.
28-RM-157889

Date Filed
August 14, 2015

INSTRUCTIONS: Unless e-Filed using the Agency's website, www.nlr.gov, submit an original of this Petition to an NLRB Office in the Region in which the employer concerned is located. The petition must be accompanied by a certificate of service showing service on all parties named in the petition of the following: (1) the petition; (2) Statement of Position form; and (3) Description of Procedures in Certification and Decertification Cases (Form NLRB 4812). The petition must also be accompanied by evidence supporting the statement that a labor organization has made a demand for recognition on the employer or that the employer has good faith uncertainty about majority support for an existing representative. However, if the evidence reveals the names and/or number of employees who no longer wish to be represented, the evidence shall not be served on any party.

1. PURPOSE OF THIS PETITION: RM-CERTIFICATION OF REPRESENTATIVE – One or more individuals or labor organizations have presented a claim to the Employer/Petitioner to be recognized as the representative of employees of the Employer/Petitioner or the Employer/Petitioner has a good faith uncertainty about majority support for an existing representative. If a charge under Section 8(b)(7) of the Act has been filed involving the Employer/Petitioner named in this petition, this statement shall not be deemed made. The Petitioner alleges that the following circumstances exist and requests that the National Labor Relations Board proceed under its proper authority pursuant to Section 9 of the National Labor Relations Act.

2a. Name of Employer/Petitioner TRAX International Corporation		2b. Address(es) of Establishment(s) involved (Street and number, city, State, ZIP code) Yuma Proving Ground, Yuma, AZ 85366	
3a. Employer/Petitioner Representative – Name and Title Brian Thompson, VP, PM, TSS Contract YPG		3b. Address (if same as 2b – state same) 11551 South Fortuna Road, Suite G&H, Yuma, AZ 85367	
3c. Tel. No. (928) 328-6515	3d. Cell No. (928) 920-2797	3e. Fax No. (928) 328-6505	3f. E-Mail Address brian.k.thompson62.ctr@mail.mil
4a. Type of Establishment (Factory, mine, wholesaler, etc.) Military Base		4b. Principal product or service Army Testing and Proving Ground	
5a. Description of Unit Involved Included: All full-time hourly employees who provide services to the U.S. government at the Yuma Proving Ground (YPG) under TRAX's contract with the government (commonly known as the "contract-wide" unit). Excluded: All employees employed in the Employer's Business and Safety and Quality Groups.			5b. City and State where unit is located: Yuma, AZ
			6. No. of Employees in Unit: 760

Unless a charge alleging a violation of Section 8(b)(7) is pending, check EITHER item 7a or 7b, whichever is applicable

7a. ☒ A labor organization made a demand for recognition on the Employer/Petitioner on (Date) August 4, 2015

7b. ☐ The Employer/Petitioner has a good faith uncertainty about majority support for an existing representative.

8a. Recognized or Certified Bargaining Agent - Name	8b. Affiliation, if any
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8c. Address	8d. Tel. No.	8e. Cell No.
	8f. Fax No.	8g. E-Mail Address

9. Date of Recognition or Certification	10. Expiration Date of Current or Most Recent Contract, if any (Month, Day, Year)
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11. Is there now a strike or picketing at the Employer's establishment(s) involved? ☐ No ☐ If so, approximately how many employees are participating? _____
(Name of labor organization) _____ has picketed the Employer since (Month, Day, Year) _____

12. Organizations or individuals other than those named in item 8, which have a contract with the Employer/Petitioner or represent employees of the Employer/Petitioner or demanded recognition as representatives and other organizations and individuals known to have a representative interest in any employees in the unit described in item 5 above. (If none, so state)

12a. Name International Association of Machinists & Aerospace Workers, Local Lodge 2282, AFL-CIO	12b. Address 1991 E. Ajo Way #143, Tucson, AZ 85713	12c. Tel. No. (602) 574-1020	12d. Cell No.
		12e. Fax No.	12f. E-Mail Address dgresham@iamaw.org

13. Election Details: If the NLRB conducts an election in this matter, state your position with respect to any such election.

13a. Election Type: <input checked="" type="checkbox"/> Manual <input type="checkbox"/> Mail <input type="checkbox"/> Mixed Manual/Mail
13b. Election Date(s): September 2, 2015
13c. Election Time(s): to be determined
13d. Election Location(s): multiple locations at YPG, following the same procedure used in the 2008 election between the parties

14. Representative of the Employer/Petitioner who will accept service of all papers for purposes of the representation proceeding.

14a. Name and Title Christopher Calsyn, Attorney at Law	14b. Address (street and number, city, state, and ZIP code) Crowell & Moring LLP, 1001 Pennsylvania Ave NW, Suite 1100, Washington, DC 20004-2505
14c. Tel. No. (202) 624-2602	14d. Cell No.
14e. Fax No. (202) 628-5116	14f. E-Mail Address ccalsyn@crowell.com

I declare that I have read the above petition and that the statements are true to the best of my knowledge and belief.

Name (Print) Christopher Calsyn	Signature 	Title Attorney at Law	Date 8-13-15
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WILLFUL FALSE STATEMENTS ON THIS PETITION CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

CERTIFICATE OF SERVICE

I hereby certify that on this day, August 17, 2015, a true and correct copy of the foregoing Motion to Stay Further Processing of Petitions was filed electronically with Region 28 using the NLRB e-filing system and was sent via mail to the following additional parties:

Caren Sencer, Esq.
Weinberg, Roger & Rosenfeld
1001 Marina Village Parkway, Suite 200
Alameda, CA 94501-1091

A handwritten signature in blue ink, appearing to read 'Glenn D. Grant', is written over a horizontal line.

Glenn D. Grant